

## Postal Regulatory Commission

Washington, D.C. 20268-0001

### NOTICE OF FILING UNDER 39 U.S.C. § 404(d)

TO THE UNITED STATES POSTAL SERVICE:

Please take notice that on October 5, 2011, the Commission received a petition for review of the Postal Service's determination to close the Scott post office located in Scott, Mississippi. The petition for review was filed by the Scott Action Committee of Concerned Citizens (Petitioner) and was postmarked September 27, 2011.

This notice is advisory only and is being furnished so that the Postal Service may begin assembling the administrative record in advance of any formal appeal proceedings held upon the alleged (closing/consolidation) for transmittal pursuant to 39 CFR § 3001.113(a) (requiring the filing of the record within 15 days of the filing with the Commission of a petition for review). The Postal Service's administrative record is due no later than October 20, 2011.



Shoshana M. Grove  
Secretary

Date: October 6, 2011

Attachment

Postal Regulatory Commission  
Office of the Chief Administrative Officer

SEP 28 2011

Concerned Citizens Committee  
PO Box 125  
Scott, MS 38772

RECEIVED 12012-3

2011 OCT -5 A 10:48

September 27, 2011

Postal Regulatory Commission  
901 New York Ave NW  
Suite 200  
Washington, DC 20268-0001

POSTAL REGULATORY  
COMMISSION  
OFFICE OF THE SECRETARY

Dear Sirs:

We are writing you today to appeal the decision to close the Scott, Mississippi Post Office. We feel the study and the cost analysis are flawed. Our committee wrote the Mississippi District identifying these inaccuracies however; they have never been addressed and now appear in the final decision. In fact we have had no communication from the Postal Service concerning any of the issues raised in our last letter. We are enclosing a copy of the letter that was sent to them prior to their decision.

This closure will greatly affect the daily operations of the many businesses that use the Scott Post Office, of which the Monsanto Company being the largest. As important, will be the affect on many of our citizens who so greatly depend on our Scott Post Office.

We respectfully ask that you review all the information and letters written on behalf of our community and its citizens and reverse the decision of final closure.

Thank you in advance for your consideration.

Sincerely,

*Thompson Collins* *Ruby Miller*  
*Robert Norton* *Paul Taylor*

Scott Action Committee of Concerned Citizens

Copy

I am writing you in regards to the Proposal to Close the Scott, Mississippi, Post Office and Establish Service by Rural Route Service-Docket Number 1381005-38772 that was received on April 26, 2011 and posted for review on April 27, 2011 in the Scott, Mississippi, Post Office.

This document contains numerous inaccuracies that distort facts as to the makeup and importance of the Town of Scott. These documents also downplay the importance the Scott Post Office to local businesses, particularly to Monsanto Company, a multi-national business which has a major research and training center at Scott.

On page one of the Official Docket, the preparer of the document, Mr. Dana Amos, states, "Office has no rural route and is a small community developed around a paper company which has shut down operations. Revenue and residential population are both declining."

This sentence contains statements about the Town of Scott that are confused and untrue. The Town of Scott is a unique town which has both a distinguished history and an economic importance to the Delta Region of Mississippi and nationally and internationally in the field of agriculture.

The Town of Scott was established in Bolivar County as the U.S. headquarters of Delta and Pine Land Company, which has been for over 100 years one of America's premier seed companies. Delta and Pine Land Company is not and has never been a "paper company" as Mr. Amos states and it definitely has not "shut down operations."

Prior to 1978, Delta and Pine Land Company was owned by British cotton mills and was at one time the largest cotton plantation in the world. Scott became the headquarters of America's leading cotton seed breeding and research center. In 1978, Delta and Pine Land Company was acquired by U.S. owners. The world headquarters of Delta and Pine Land Company was moved from Memphis, Tennessee to Scott in 1983. In 1993, Delta and Pine Land Company became a public company, traded in the New York Stock Exchange. It was one of a handful of publicly traded companies located in Mississippi and the only NYSE traded company headquartered in the Mississippi Delta. In 2006, ownership of Delta and Pine Land Company was acquired by Monsanto Company, an international

agricultural business and one of the world's leading seed unit traits companies. Delta and Pine Land Company at Scott remains a major research, breeding and training center for Monsanto.

The Delta and Pine Land Company/Monsanto facility at Scott is one of the largest employees in Bolivar County and the Mississippi Delta. Its work force is largely made up of seed breeders and other scientists as well as technical, clerical and administration personnel.

The Town of Scott is the home of many of these employees, causing Scott to have one of the highest average per capita incomes in the Mississippi Delta. This is an economically important center which needs good communications, including a local post office.

The headquarters of Delta and Pine Land Company/Monsanto has attracted other businesses and other residents to the Town of Scott, including the Lake Bolivar Gin, reopening in 2011 with 15 employees. Other local businesses who use the Scott Post Office are listed below.

Although the Town of Scott is over 100 years old, unlike some other Delta communities, its population is not declining. As of this date, there is only one home for sale. All of the other residences are occupied. Virtually all residences are owned by their residents, including a number of houses in the upper income range as well as many well maintained middle income family home.

On page 15 of the Docket 1381009, the form "Post Office Survey Sheet", Question No. 7 asks, "Which career and non career employees will be affected and what accommodations will be made for them?" The answer: "Postmaster is vacant. Only affected employee will be non career PMR." This statement is not true. The Scott Post Office has had an OIC, Dana Kline in that office since April, 2010. The closing will greatly affect her. She has six years of non-career service to the USPS. Losing this position will reduce her hours to only two guaranteed hours a week. This will also negatively affect service at the Scott Post Office.

Page 16 of the Docket 1381005, the form "Community Survey Sheet", Question No. 1 states: "Local government provided by : Washing." (Apparently meaning "Washington County".) This is totally inaccurate. The Town of Scott is in Bolivar

County. Local government is provided by Bolivar County. The statement that police Protection provided by "Washington County" is also inaccurate. Police protection is provided by the Bolivar County Sheriff Department. The fact that the preparer of the Questionnaire does not even know what county the Town of Scott is in calls into question the validity of any of his responses.

Question No. 3 asks "What residential, commercial or business growth is expected?" The answer, "There is no new construction or potential new business in the area. The department of economic Affairs [sic] projects continued declines in jobs and earning potential in the area." This response shows that the preparer of the questionnaire has no knowledge of the unique nature of the Town of Scott. This is the site of a large research and development facility of Monsanto Company, one of America's largest corporations. Delta and Pine Land Company/Monsanto has invested large amounts of money in Scott including a three-story office building, computer center, state of the art HVI fiber testing facility, greenhouses, laboratory facilities and warehouses. Within the past two years, Monsanto built a new Cotton Research Center investing over \$12.5 million in Scott.

As stated at the town meeting and provided in the packet mailed to the US Postal Service, the Lake Bolivar Gin, a locally owned business, is reopening in 2011, bringing another 15 jobs to Scott. Scott is on the route of Interstate 69, a major new interstate highway stretching from the Canadian border in Michigan to the U.S./Mexico border in Texas. I-69 is presently under construction including a 15 mile stretch opened for traffic in Desoto and Tunica Counties in Mississippi. The crossing point for I-69 over the Mississippi River is located due west of the Town of Scott at Eutaw Landing. Bridge construction at that site is projected within the next U.S. DOT budget cycle and will take 3-4 years involving hundreds of workers and numerous construction companies. Upon completion, I-69, which will have a major interchange just north of Scott, is projected to generate long term industrial and commercial job growth in the Scott area.

Question No. 4 asks: "Are there any special historical events related to the community?" The answer: "No special events or historical sites that the PMR or OIC are aware of." This is not accurate. The largest natural disaster in US history occurred in Scott, The Great Flood of 1927, in which the Mississippi River Levee broke at Mounds Landing within sight of Scott. There are historical markers

commemorating that event and also honoring nationally recognized blues artist Bill Bronzy who was born in Scott. There are also plans to have the building in which the Post Office is located placed on the National Registry of Historic Places. This building housed the original offices of Delta and Pine Land Company, the largest cotton breeding company in the U.S.

The area near Scott along the Mississippi River is part of one of the main migratory bird flyways in the United States. This results in the area being the site of a number of hunting clubs for duck and geese hunters, bringing thousands of tourists/hunters into the Scott vicinity annually. Many of these visitors use services in the Town of Scott including the Post Office during hunting season.

Question No. 5 asks: "What is the geographic/economic make-up of the community. The answer: "Farmers, Commuters and Retirees" is inaccurate. Scott is a very diverse community made up of PhD's, other scientific researchers, highly skilled technicians, business owners, other professionals as well as employed workers, some of who are commuters, and a few retirees. The statement "Most jobs in area were provided by the Monsanto Corporation but they are now a R&D site and very few jobs left" is also wildly inaccurate. Monsanto is a well known seed and technology company. The Monsanto facility at Scott is a research and development site for all crops, including not only cotton but also soybeans, corn and other conventional and genetically modified crops. This is a very positive fact, not a negative as Mr. Amos implies. Monsanto's facility at Scott is the largest employer in this part of Bolivar County and one of the largest in the entire county. Monsanto employs 65 fulltime employees and 15-20 temporary employees. Their site lead is on the Jobs for Mississippi Graduates Board, bringing students across the Delta to Scott for learning tours. Monsanto hosts over 2,500 visitors a year through the Learning Center, not only students but also agriculture specialists.

Question No. 6 asks: "Do employees of the office offer assistance to senior citizens and the handicapped?" Answer "none" is inaccurate. Both the PMR and the OIC help many of Scott's senior citizens or homebound by receiving their bills and their money, then converting and filling out their money orders and preparing them for mailing. These individuals cannot conveniently travel to Benoit or Greenville for these services since public transportation or even taxi service is not available.



Page 17, the Route Cost Analysis Form is filled out with all zeros. How can this be an accurate picture of the replacement service cost? This zero cost analysis is inaccurate and makes this proposal to close to the Scott Post Office invalid.

On page 18, the Post Office Closing Proposal Fact Sheet also contains factual errors. Question No. 17 states: "School, Churches and Organizations in Service Area, No: 0." Question No. 18 states: "Businesses in Service Area, No: 0." The "zero" response appears on these questions despite the fact that the form itself lists two churches and six businesses: "Scott Water District, Scott Foundation, Scott Store, Scott Farm Supply, Lake Bolivar Gin and Monsanto." Even with these listed, the list of businesses is incomplete. There are several businesses not listed: Ag Air, Capstone Farms, Deer Creek Foundation and the Seven Star Church. Several other nearby businesses rent boxes in Scott including: Crossley Axminster and Weed Free. The answers to Questions 17 and 18 are definitely not "0."

The financial savings stated in the proposal is invalid. During the town meeting, a resident asked for a line item cost replacement analysis. Mr. Amos and Ms Ellis stated it would be available in three weeks from the meeting. The analysis given on the form is not line item and, in fact, shows replacement cost as zero. There is no way the replacement cost would be zero. The proposal also shows the expense of a Postmaster, which would not be a necessary expense. There are Post Offices that have operated with OIC's for years. The current OIC makes \$10.93 an hour with no benefits. Service by an OIC like Ms. Kline, would be acceptable to the Community.

In regard to rent, Monsanto has offered to reduce or even eliminate the cost of building rental (shown as \$2,040 per year) but to this date Mr. Amos has not contacted Monsanto to obtain a rent-free lease. Leaving the OIC in position and eliminating rent would considerably reduce the operations cost.

The above-mentioned inaccuracies completely distort the value and importance of Scott as a vital part of Bolivar County and the State of Mississippi. The closing of the Scott Post Office will negatively affect the business operations of one of Bolivar County's and the State's largest businesses and the other businesses who use the Scott Post Office. This is in addition to the inconvenience and hardships, closure will cause to local residents.

**It is disturbing that a proposal containing so many factual and financial inaccuracies and mistakes could be used to justify a closure that could change the lives and daily business of such a vital and progressive community. Speaking for the Community of Scott, we strongly urge the U.S. Postal Service to disregard this Proposal and continue service at the Scott Post Office.**



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*Kimberly Collins* *Ruby Miller*  
*Robert Horton* *Paul Hatcher*  
Scott Action Committee of Concerned Citizens